

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-CR-20560

UNITED STATES OF AMERICA

v.

RODERICK VANDERBILT

Defendant.

UNITED STATES' FIRST RESPONSE TO THE STANDING DISCOVERY ORDERS

On January 17, 2025, United States Magistrate Judge Jonathan Goodman entered a paperless Standing Discovery Order (ECF No. 8) as to Defendant Roderick Vanderbilt. The United States hereby files this First Response to the Standing Discovery Order as to the Defendant, in compliance with Local Rule 88.10 and Federal Rule of Criminal Procedure 16.

In accordance with local and federal rules, the parties met and conferred regarding the government's discovery productions and the following materials have been produced to the Defendant:

On December 17, 2024, the United States provided the Defendant with a production of approximately 34 documents supporting the allegations in the Criminal Information filed on December 31, 2024 (ECF No. 1).

On March 6, 2025, the United States provided the Defendant with a supplemental production of approximately 50 documents.

On March 11, 2025, the United States provided the Defendant with a third production of approximately 3,652 documents, consisting of email communications and attachments.

On March 18, 2025, the United States provided the Defendant with a fourth production of approximately 29 documents, consisting of memorandum of interview reports, interview notes, and proffer agreements.

On April 4, 2025, the United States provided the Defendant with a fifth production of approximately 68 documents, consisting of memorandum of interview reports and notes.

On April 10, 2025, the United States provided the Defendant with a supplemental production of one document, consisting of interview notes.

On April 18, 2025, the United States provided the Defendant with a seventh production of approximately 289,989 documents, consisting of recordings, interview reports and agent notes, and files from the Defendant's electronic device.

The United States is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, *Brady*, *Giglio*, and *Napue*.

Respectfully submitted,

LORINDA I. LARYEA
Acting Chief, Fraud Section
Criminal Division
U.S. Department of Justice

By: /s/ Lauren Archer
Lauren Archer
Trial Attorney
Florida Special Bar No. A5502575
United States Department of Justice
Criminal Division, Fraud Section
1400 New York Ave., NW
Washington, DC 20005
Tel: (202) 538-3859
Email: Lauren.Archer2@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2025, the foregoing was filed via the CM/ECF electronic filing system and served on all counsel of record as described in Local Rule 5.4.

By: /s/ Lauren Archer
Lauren Archer
Trial Attorney
Florida Special Bar No. A5502575
United States Department of Justice
Criminal Division, Fraud Section
1400 New York Ave., NW
Washington, DC 20005
Tel: (202) 538-3859
Email: Lauren.Archer2@usdoj.gov